

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Plaintiff,

Case No. 2:14-cv-10266-SJM-LJM
Hon. Judith E. Levy
Mag. Judge David R. Grand

v.

UNIVERSAL HEALTH GROUP, INC.
A/K/A MICHIGAN SPINE AND REHAB,
UHG MANAGEMENT, LLC,
PROFESSIONAL HEALTH SYSTEMS,
LLC A/K/A PROFESSIONAL MEDICAL
BILLING, LLC, SCOTT P. ZACK, D.C.,
DAVID M. KATZ, D.C.,
LOREN C. CHUDLER, D.O.,
JOSEPH F. DESANTO, HORIZON
IMAGING, LLC, CLEAR IMAGING, LLC,
JEFF S. PIERCE, D.O.,
THOMAS D. CARUSO, D.O., and
KATHERINE H. KARO, D.O.,

Defendants.

**DEFENDANTS HORIZON IMAGING, LLC'S AND
CLEAR IMAGING, LLC'S CONCURRENCE AND JOINDER IN
DEFENDANTS KATZ'S AND ZACK'S REPLY BRIEF IN SUPPORT OF
THEIR MOTION TO DISMISS [DOCKET NO. 64], AND
SUPPLEMENTATION THERETO**

Defendants, HORIZON IMAGING, LLC and CLEAR IMAGING, LLC (“Horizon” and “Clear”), by and through their attorneys, Stark Reagan, PC, concur, adopt, and incorporate herein by reference as if fully set forth all of the issues, arguments, cited opinions, legal analysis, and conclusions set forth in Defendants David Katz’s and Scott Zack’s Reply Brief in Support of their Motion to Dismiss [Docket No. 64]. The issues and law set forth in that Reply Brief [Docket No. 64] are common to the issues pertaining to Horizon and Clear, and in the interest of judicial economy there is no need to separately repeat them *in toto* here.

As such, Defendants Horizon and Clear request dismissal of all counts against them for the reasons set forth here and in Defendants David Katz’s and Scott Zack’s Reply Brief in Support of Their Motion to Dismiss [Docket No. 64]. If requested by the Court, Horizon and Clear will further supplement their positions.

STARK REAGAN

/s/ Peter L. Arvant

PETER L. ARVANT (P52809)

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LLC and Clear Imaging, LLC

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Date: June 17, 2014

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2014, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record.

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Jessica Foster
JESSICA FOSTER

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